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August 31, 2016

VIA ECF and E-mail

Honorable Kimba M. Wood
Senior United States District Judge
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Williams, Steven Brown, Gerald Seppala.*
Docket No. S3 16 Cr. 436 (KMW)

**Reply Letter on Application To Extend Travel Restriction Bail Conditions
And For The Court's Permission To Defendant Brown for European Travel**

Dear Judge Wood:

I write in response to AUSA Patrick Egan's letter today opposing defendant Steven Brown's requested international travel necessary for primarily business reasons but also for a family baptism and his wife's birthday. I have not waited for the Court's ruling on his request because time is of the essence given this difficult time for scheduling airline travel because of its proximity to September 11 and the Labor Day holidays. There will come a time for Mr. Brown to demonstrate the business damages caused him by the uninformed actions of the government respecting the movie business and its investigative conduct, but this is not it.

However, I would like to respond to the government's assertions in its letter:

1) The movies 'Ghoul' and 'Kajinek' have indeed been completed but have been sold only in 10% of the world. Mr. Brown's presence is necessary in furthering promotion and sales of these movies to the rest of the world;

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2) 'Dance Angels' has not been released, and Mr. Brown is directly involved in two to three days of reshoot filming, more casting, new music and re-editing;

3) 'Kidnap' is not to be released until December 2016. Mr. Brown is the executive producer, and he has immediate responsibilities to market, promote and oversee sales throughout the world;

4) 'Warriors in Prague' is only a working title for a major film to be shot in the next one year in the Czech Republic in English. Mr. Brown is a producer for this project and must be present to perform his duties; and

5) Mr. Brown's presence in England is designed to facilitate the possible signing of an Oscar-nominated actor for a major film.

I hope this information is helpful to the Court in assessing that much of Mr. Brown's business is international in scope and practice. None of his co-defendants are involved in these projects pre-production, filming, post-production/editing or sales which are essential to his continuing employment and his support of family obligations. Mr. Brown will continue to provide detailed itineraries to Pretrial Services which I continue to believe is being done to that Office's satisfaction.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Walter Mack

cc: AUSA Patrick Egan (by ECF and email)
PTSO Matthew Carter (by email)
PTSO Natasha Ramesar (by email)